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*C. R. Bard, Inc. and*  
*Bard Peripheral Vascular, Inc.*

**IN THE UNITED STATES DISTRICT COURT**

**FOR THE DISTRICT OF ARIZONA**

IN RE: Bard IVC Filters Products Liability  
Litigation,

This Document Relates to:

Lisa Hyde, et al. v. C. R. Bard, Inc., et al.  
CV-16-00893-PHX-DGC

No. 2:15-MD-02641-DGC

**JOINT NOTICE OF LODGING  
UNDER SEAL CERTAIN  
EXHIBITS IN SUPPORT OF  
JOINT REPORT ON  
DETERMINING FILTER TYPE**

(Assigned to the Honorable David G.  
Campbell)

Pursuant to the Stipulated Protective Order (Doc. 269) and Local Civil Rule 5.6, the Parties file this Notice of Lodging Under Seal certain exhibits attached in support of the Joint Report on Determining Filter Type. These exhibits contain Plaintiff's personal healthcare information that is protected under HIPAA and confidential under the Stipulated Protective Order. Because the documents lodged under seal only relate to Plaintiff's personal healthcare information, the Parties agree that it is Plaintiff's burden to file a motion to seal, to the extent one is needed. A list of the exhibits lodged under seal are attached hereto as Exhibit A.

RESPECTFULLY SUBMITTED this 10<sup>th</sup> day of August, 2018.

GALLAGHER & KENNEDY, P.A.

NELSON MULLINS RILEY &  
SCARBOROUGH, LLP

By: /s/ Mark O'Connor (with permission)

By: /s/ Richard B. North, Jr.

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 10th day of August, 2018, the foregoing was electronically filed with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to all attorneys of record.

s/Richard B. North, Jr.  
Richard B. North, Jr.

**EXHIBIT A**

**DOCUMENTS PROPOSED TO BE FILED UNDER SEAL**

Defendants request they be permitted to file under seal the following documents in support of the parties' Joint Report on Determining Filter Type:

1. Defendants' Exhibit 1 – Plaintiffs' Profile Form
2. Defendants' Exhibit 2 – Plaintiffs' Fact Sheet
3. Defendants' Exhibit 3 – Selected Plaintiff Medical Records
4. Defendants' Exhibit 4 – Excerpts of deposition of Dr. David Henry
5. Defendants' Exhibit 5 – Excerpts of deposition of Dr. William Kuo
6. Defendants' Exhibit 8 – Excerpts of deposition of Matt Fermanich
7. Defendants' Exhibit 12 – Original Complaint File
8. Defendants' Exhibit 13 – Supplemental Complaint File
9. Defendants' Exhibit 14 – Second Supplemental Complaint File
10. Plaintiffs' Exhibit 3 – Supplemental Complaint File
11. Plaintiffs' Exhibit 4 – Selected Plaintiff Medical Records
12. Plaintiffs' Exhibit 5 – Excerpts of deposition of Dr. David Henry
13. Plaintiffs' Exhibit 11 – Selected Plaintiff Medical Records
14. Plaintiffs' Exhibit 12 – Excerpts of deposition of Dr. William Kuo
15. Plaintiffs' Exhibit 13 – Excerpts of deposition of Dr. David Henry
16. Plaintiffs' Exhibit 14 – Selected Plaintiff Medical Records